

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PATRICK ROSS and  
BUFFY REDFISH,

Defendants.

---

CR 24-50185

UNITED STATES' MOTION  
TO AMEND CONDITIONS OF  
RELEASE

The United States of America, by and through Assistant United States Attorney Benjamin Patterson, moves the court to amend the conditions of release for both defendants, Patrick Ross and Buffy Redfish. Ross and Redfish have made their initial appearances and were released on conditions. Dockets 8 and 15. The United States requests the Court amend the conditions of release to include the following additional condition:

- You shall not transfer, sell, or dispose of any assets without prior approval of the court.

The basis for this motion is that a substantial amount of the proceeds embezzled by the defendants as alleged in the indictment were used to purchase business equipment, vehicles, and homes. The United States included in the indictment a forfeiture provision pursuant to 18 U.S.C. §§ 981 and 982, 28 U.S.C. § 2461(c), and 21 U.S.C. § 853(p), that included “any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.”

Docket 1. The forfeiture provision also included a substitute asset provision. *Id.* As such, the United States requests that the defendants not be permitted to transfer, sell, or dispose of any assets without the Court's approval and the opportunity of the United States to respond to the request.

Dated this 24th day of January, 2025.

ALISON J. RAMSDELL  
United States Attorney

/s/ Benjamin Patterson  
Benjamin Patterson  
Assistant United States Attorney  
515 9th Street, Room 201  
Rapid City, SD, 57701  
Telephone: (605) 342-7822  
E-mail: Ben.Patterson@usdoj.gov